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13 Attorneys for Defendant  
14 WALMART INC.

15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA  
17

18 KORTNEY OLSON,  
19 Plaintiff,  
20 v.  
21 WALMART STORES INC. AND  
WONDER NATION,  
22 Defendants.  
23

Case No. 2:20-cv-00152-GMN-NJK

**UNOPPOSED MOTION TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT**

**(First Request)**

Complaint served: February 7, 2020  
Current response date: February 28, 2020  
New response date: March 30, 2020

Judge: Gloria M. Navarro  
Magistrate Judge: Nancy J. Koppe

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25  
26 According to Local Rule IA 6-1 of the United States District Court for the  
27 District of Nevada, Walmart Inc., owner of the subsidiary that owns the trademark  
28 Wonder Nation ( "Defendant"), with Plaintiff's consent, respectively requests that

1 the Court extend Defendant's time to respond to Plaintiff's Complaint. This is  
2 Defendant's first request.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 On January 22, 2020, Plaintiff filed a Complaint with the United States  
5 District Court for the District of Nevada. On February 7, 2020, Plaintiff caused  
6 copies of the Summons and Complaint to be delivered and served on Defendant.  
7 Defendant has until February 28, 2020 to answer, move to dismiss or strike, or  
8 otherwise respond to Plaintiff's Complaint.

9 Plaintiff, who originally filed her complaint pro se, has now retained counsel  
10 and has granted Defendant a 30-day extension of time from its original response  
11 date, pursuant to which Defendant shall have until March 30, 2020 to answer, move  
12 to dismiss or strike, or otherwise respond to Plaintiff's Complaint. Plaintiff's  
13 counsel is not yet admitted in Nevada, nor has he retained the services of local  
14 counsel in this jurisdiction.

15 Plaintiff's retention of counsel and the parties' interests in resolving this  
16 dispute serves as just cause for the filing of this request. Defendant reserves the  
17 right to file an answer, motion or dismiss or strike, or other responsive pleading  
18 prior to its March 30, 2020 deadline.

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21 //

1 Therefore, Defendant respectfully moves this Court for an extension until  
2 and including **March 30, 2020** to answer, move to dismiss or strike, or otherwise  
3 respond to the Complaint filed in this matter.

4  
5 Dated: February 28, 2020

**ROPERS MAJESKI KOHN &  
BENTLEY PC AND ARENT FOX LLP**

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8 By: /s/ Timothy J. Lepore

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**CERTIFICATE OF SERVICE**

In accordance with Rule 5(b) of the Federal Rules of Civil Procedure, and Local Rule IC 4-1(d), I hereby certify that on February 28, 2020, a copy of **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT**, was served on all CM/ECF registered parties by filing and serving the same using the CM/ECF filing system.

/s/ Timothy J. Lepore

An employee of Ropers Majeski Kohn  
& Bentley, P.C.

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20 v.  
21 WALMART STORES INC. AND  
22 WONDER NATION,  
23 Defendants.

Case No. 2:20-cv-00152-GMN-NJK

**ORDER TO EXTEND TIME TO  
RESPOND TO INITIAL  
COMPLAINT**

Complaint served: February 7, 2020  
Current response date: February 28, 2020  
New response date: March 30, 2020

Judge: Gloria M. Navarro  
Magistrate Judge: Nancy J. Koppe

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25 The Court, having reviewed Walmart Inc. (“Defendant”)’s Unopposed  
26 Motion to Extend Time to Respond to Plaintiff Kortney Olson’s Initial Complaint,  
27 and finding that just cause exists to extend Defendant’s deadline to answer or  
28 otherwise respond to the Complaint, hereby orders as follows:

1 Defendant shall have to, and including, March 30, 2020 to answer or  
2 otherwise respond to the Complaint.

3 **IT IS SO ORDERED.**

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5   
6 Honorable Nancy J. Koppe  
7 United States Magistrate Judge

8 Dated: March 2, 2020  
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